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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

KING CHUEN TANG a/k/a CHEN TANG,  
RONALD YEE, ZISEN YU, JOSEPH SETO,  
MING SIU, KING S. TANG a/k/a JAMES K.  
TANG, and YING KIT YU a/k/a EDDIE YU,

Defendants,

and

VENTURE ASSOCIATES FUND I, TANG  
CAPITAL PARTNERS, ACCELERATION  
CAPITAL PARTNERS, AMERICAN  
PEGASUS LONG SHORT FUND  
SEGREGATED PORTFOLIO, PING LEE  
TANG, KA LING LEE, YIN LEE KA,  
CHEUNG-TING KA, SYLVIA TSUI, DOI  
PING SIU, YUEN-LAI MA, LEUNG-KEE  
SIU, ROSALIE CHO, and MINOR CHILD I  
and MINOR CHILD II, minor children of  
Defendant King Chuen Tang a/k/a Chen Tang,

Relief Defendants.

Case No. 3:09-cv-05146-JCS

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING FACT  
DISCOVERY DEADLINE**

Judge: Hon. Joseph C. Spero

Date Comp. Filed: October 30, 2009

Trial Date: February 13, 2012

**WHEREAS**, the schedules of the parties and witnesses have rendered it highly difficult to complete the depositions of various defendants and third-party witnesses within the allotted time;

**WHEREAS**, extending the non-expert discovery cutoff date until September 30, 2011 would not have any effect on any other deadlines set by this Court;

1. The cutoff date related to non-expert discovery is extended until September 30, 2011.

Respectfully submitted,

/s/ Jennifer D. Brandt  
Jennifer D. Brandt, Esq.  
*Counsel for Plaintiff Securities and Exchange  
Commission*

/s/ Jahan P. Raissi  
Jahan P. Raissi, Esq.  
*Counsel for Defendant King Chuen Tang  
a/k/a Chen Tang and Relief Defendants, Tang  
Capital Partners, Venture Associates Fund I,  
Minor Child I and Minor Child II, Ping Lee*

*Tang, Ka Ling Lee, Yin Lee Ka, and Cheung-Ting Ka*

Dated: August 24, 2011

/s/ Jay Pomerantz  
Jay Pomerantz, Esq.  
*Counsel for Defendant Ming Siu and Relief Defendants Sylvia Tsui, Doi Ping Siu, Yuen-Lai Ma, and Leung-Kee Siu*

Dated: August 24, 2011

/s/ Ismail Ramsey  
Ismail Ramsey  
*Counsel for Defendant Zisen Yu and Relief Defendant Acceleration Capital Partners*

Dated: August 24, 2011

/s/ Christopher J. Cannon  
Christopher J. Cannon, Esq.  
*Counsel for Defendant Joseph Seto*

Dated: August 24, 2011

/s/ Alan W. Sparer  
Alan W. Sparer, Esq.  
*Counsel for Relief Defendant American Pegasus Long Short Fund Segregated Portfolio*

Dated: August 24, 2011

/s/ Thomas Brown  
Thomas Brown, Esq.  
*Counsel for Defendant King S. Tang a/k/a James S. Tang and Relief Defendant Rosalie Cho*

Dated: August 24, 2011

/s/ Michael Celio  
Michael Celio, Esq.  
*Counsel for Defendant Ronald Yee*

Dated: August 24, 2011

/s/ Hugh Levine  
Hugh Levine, Esq.  
*Counsel for Defendant Ying Kit Yu a/k/a Eddie Yu*

**ATTORNEY ATTESTATION**

I hereby attest that the concurrence in the filing of this document has been obtained from the signatory indicated by a “conformed” signature (/s/) within this e-filed document.

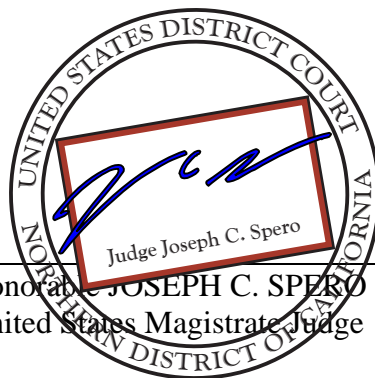
/s/ Jennifer D. Brandt  
Jennifer D. Brandt, Esq.

**ORDER**

**PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:**

1. All non-expert discovery shall be completed by September 30, 2011.
2. All other dates set pursuant to the Court's Further Case Management and Pretrial Order of May 17, 2011 shall remain in place.

Dated: 08/26/2011



Honorable JOSEPH C. SPERO  
United States Magistrate Judge